

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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DEBORAH S. SKEANS, Executrix of the  
ESTATE OF FRANK E. PAVLIS,

*Plaintiff,*

v.

KEY COMMERCIAL FINANCE, LLC,  
KEY COMMERCIAL FINANCE  
PROPERTIES, LLC, EQUITY PROS, LLC,  
and MOBILE AGENCY, LLC

*Defendants.*

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C.A. No. 1:18-cv-01516-CFC

**DEFENDANTS' MOTION TO DISMISS**

Defendants Key Commercial Finance, LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC, and Mobile Agency, LLC (collectively, "Defendants"), by and through their undersigned counsel, hereby move to dismiss the Verified Complaint [D.I. 1] filed by plaintiff Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6). The grounds for the motion are more fully set forth in Defendants' Opening Brief in Support of Their Motion to Dismiss. Defendants respectfully request that the Court grant the [Proposed] Order, filed concurrently herewith, dismissing the Verified Complaint.

Dated: November 20, 2018

**HALLORAN FARKAS + KITTILA LLP**

/s/ Theodore A. Kittila

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